
MAIN CASE

Reference No: Sunnica Energy Farm

Proposal: The installation of solar photovoltaic generating panels and electrical battery storage technology on Sunnica East and Sunnica West, and associated infrastructure for connection to the national grid, including an extension to the Burwell National Grid Substation. The Scheme would allow for the delivery of over 50 megawatts of renewable energy.

Site Address: Isleham to Burwell via Chippenham

Applicant: Sunnica Ltd

Case Officer: Andrew Phillips

Parish: Primary development located in Cambridgeshire is within: Isleham, Kennett, Chippenham, Snailwell, Burwell

Ward: Fordham & Isleham and Burwell

Date Received: **Expiry Date:** 11 November 2022
Report Number X97

1.0 **RECOMMENDATION**

1.1 Members are requested to:

- i) Approve the consultation response, which sets out the Council's Objection to elements of the proposal, as set out in Appendix 1; and
- ii) In the event that the proposal is approved by the Examining Authority, delegate authority to the Case Officer, in consultation with the Chairman of Planning Committee, to determine the requirements under the Development Consent Order.

2.0 **SUMMARY OF APPLICATION**

2.1 This application is being determined by the Secretary of State who will receive a report and a recommendation by the Planning Inspectorate (The Examining Authority, ExA). The ExA will be making its recommendation early next year. The application is being determined under the development consent order procedure due to the proposal creating more than 50MW from solar energy, which is the threshold for energy development in England.

2.2 East Cambridgeshire District Council (ECDC) is a consultee and not the determining body. Officers of ECDC have worked with West Suffolk Council,

Cambridgeshire County Council and Suffolk County Council in forming responses to this proposed development including the Local Impact Report (LIR). It is strongly advised that the Written Representation focus only on those aspects that this Council has detailed knowledge/expertise on; for instance, comments on the built historic environment would be appropriate while commenting on highway safety would not be. ECDC as detailed above have worked with the three other relevant councils to ensure that between all the four councils all issues covered by these councils will be brought to the ExA's attention. It should also be recognised that certain aspects of the impact of the development will be covered by experts that are not held within any of the four councils.

2.3 The Council is requested to comment on the application which seeks consent for the installation of solar photovoltaic generating panels and electrical battery storage technology on Sunnica East and Sunnica West, and associated infrastructure for connection to the national grid, including an extension to the Burwell National Grid Substation. The Scheme would allow for the delivery of over 50 megawatts of renewable energy. It is noted that the developer is working on an option that will mean that no upgrade work will be required to the Burwell National Grid Substation.

2.4 It is important that members have considered the Draft Development Consent Order (DCO), as well as the submitted reports/documents/plans when coming to its recommendation. The DCO is a piece of legislation that grants both approval to National Strategic Infrastructure Projects (NSIPs), it also can remove and/or amend other national legislation.

2.5 The full planning application, plans and documents submitted by the Applicant can be viewed online via the National Infrastructure Planning Public Access online service, via the following link: <https://infrastructure.planninginspectorate.gov.uk/projects/eastern/sunnica-energy-farm/?ipcsection=overview>

3.0 THE SITE AND ITS ENVIRONMENT

3.1 The application site itself is a total of 981 hectares (excluding the cable routes), which is 2,424 acres.

4.0 RESPONSES FROM CONSULTÉES

4.1 The Local Impact Report (LIR) forms the joint response that officers of ECDC have prepared with West Suffolk Council, Cambridgeshire County Council and Suffolk County Council. This forms Appendix 2 in this report.

4.2 The LIR contains the professional expertise of the relevant officers from all four councils. In order to determine the Council's response (Written Representation) the LIR must have been read.

5.0 THE PLANNING POLICY CONTEXT

5.1 National Policy Statement (NPS), please use following link:
<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/national-policy-statements/>

- EN-1 Overarching National Policy Statement for Energy
- EN-1 Draft Overarching National Policy Statement for Energy
- EN-3 Draft National Policy Statement for Renewable Energy Infrastructure
- EN-5 National Policy Statement for Electricity Networks Infrastructure

5.2 East Cambridgeshire Local Plan 2015

- GROWTH 2 Locational Strategy
- GROWTH 3 Infrastructure requirements
- GROWTH 5 Presumption in favour of sustainable development
- EMP6 Development affecting the horse racing industry
- ENV 1 Landscape and settlement character
- ENV 2 Design
- ENV 4 Energy efficiency and renewable energy in construction
- ENV 6 Renewable energy development
- ENV 7 Biodiversity and geology
- ENV 8 Flood risk
- ENV 9 Pollution
- ENV 11 Conservation Areas
- ENV 12 Listed Buildings
- ENV 14 Sites of archaeological interest
- COM 5 Strategic green infrastructure
- COM 7 Transport impact
- COM 8 Parking provision

5.3 Supplementary Planning Documents

- Design Guide
- Contaminated Land
- Cambridgeshire Flood and Water
- Renewable Energy Development (Commercial Scale)
- Climate Change
- Natural Environment
- County Wildlife Sites

5.4 Neighbourhood Plans

- Fordham Neighbourhood Plan (Made 18 December 2018)
- Isleham Neighbourhood Plan (Made 19 May 2022)

5.5 National Planning Policy Framework 2021

- Chapter 2 Achieving sustainable development
- Chapter 4 Decision-making
- Chapter 6 Building a strong, competitive economy
- Chapter 8 Promoting healthy and safe communities
- Chapter 9 Promoting sustainable transport

Chapter 11	Making effective use of land
Chapter 12	Achieving well-designed places
Chapter 14	Meeting the challenge of climate change, flooding and coastal change
Chapter 15	Conserving and enhancing the natural environment
Chapter 16	Conserving and enhancing the historic environment

6.0 PLANNING COMMENTS

6.1 The application is assessed, in environmental terms on the basis of the Rochdale Envelope, which means the assessment is based on the worst-case scenario that if the Development Consent Order (DCO) is approved it allows for future flexibility for the developer.

6.2 The main elements of the entire application are:

- Solar Panels that measure 2.5 metres (8.2 feet) above ground level.
- A maximum of 136 Solar Stations (comprises an invert, transformer and switchgear) measuring 17m (55.8 feet) x 6.5m (21.3 feet) with a height of 3.5m (11.5 feet) for the outdoor stations. The indoor stations are slightly smaller.
- A maximum 136 weather stations with a maximum height of 6m (19.7 feet).
- Battery Energy Storage Systems (BESS) Battery Containers will have maximum measurements of 17m (55.8 feet) x 6m (19.7 feet) and 6m (19.7 feet) in height.
- 3 BESS Compounds measuring a maximum: Sunnica East A 66,000 sqm (710, 418 square feet), Sunnica East B 162,000 sqm (1,743,753 square feet) and Sunnica West Site A 83,000 sqm (947, 224 square feet). Lithium batteries will be grouped in racks, protected by structures/containers.
- Battery Stations comprising transformers, switchgear and other relevant equipment will have a maximum height of 6m (19.7 feet).
- Monitoring and Control System will have a maximum height of 6m (19.7 feet).
- Internal BESS Fire Suppression System (sprinkler or water mist system) can be located either externally or internally on each BESS container. Will have a maximum height of 6m (19.7 feet).
- External Fire Fighting Water Tanks, one or two tanks within each BESS compound. Will store a maximum amount of 242.5 cubic metres (53342 imperial gallons) of water, no minimum water storage set.
- Fire Fighting Water Containment a bunded BESS area linked to a bunded lagoon to capture fire water run off. Will have a volume of 410 cubic metres (90187.4 imperial gallons).
- Three onsite substations (shunt reactor Sunnica East Site B only if Option 3 is taken up). Maximum parameters of each substation are: Sunnica East Site A 85m (278.9 feet) x 55m (180 feet), Sunnica East Site B 85m (278.9 feet) x 130m (426.5 feet) and Sunnica West Site A 85m (278.9 feet) x 130m. With a maximum height of 10m (32.8 feet). Each substation can include a control building or container, welfare facilities and hardstanding.
- Burwell National Grid Substation Extension (Option 2) would have the maximum parameters of 43m (141 feet) x 76m (249 feet), with a height of 12m (39.4 feet). Will include transformer compound, substation, control building and other associated electrical bays to connect into existing network.

- Office warehouse buildings on Sunnica East Site A maximum dimension are 13m (42.7 feet) x 31m (101.7 feet) with a maximum height of 5m (16.4 feet).
- Grid connection routes – 33kV cables to export and import electricity to the onsite substations. Option 2 132kV to export and import electricity to the Burwell National Grid Substation Extension and 400kV then to the Burwell National Grid Substation. Option 3 400kV cables to export electricity from Sunnica West Site A, Sunnica East Site and Sunnica East Site B. It is noted that developer does not mention a connection from Sunnica West Site B on page 3-15 of their Environmental Statement Scheme Description 30 August 2022, it is presumed this will be 33kV connection. The maximum width of the cable corridor (per trench) is 3.5m (11.5 feet) wide x 2m (6.6 feet) deep.
- A maximum of 300 5m (16.4 feet) tall CCTV poles.
- Other associated work including but not limited to other cabling and electrical equipment.

6.3 The developer amended its submission on 30 August 2022 due to it no longer being able to extend the Burwell National Grid Substation, thus removing the adjacent Option 1. Option 2 remains which is set on the other side of Newham Drove and the new Option 3 was added that allows for 400kV cables from the onsite substations to Burwell National Grid Substation.

6.4 The Environmental Statement Chapter 5 page 6 states:
 “Operational effects are the effects that are associated with operational and maintenance activities during the generating lifetime of the Scheme. This includes the effects of the physical presence of the energy infrastructure, and its operation, use and maintenance. Timescales associated with these enduring effects are as follows:
 a. Short term – endures for up to 12 months;
 b. Medium term – endures for 1-5 years;
 c. Long term – endures for 5+ years;”

6.5 On this basis the development will be judged that any harm that lasts greater than 5 years is long term. Given the scheme is proposed for 40 years, this has the potential of up to 35 years long term harm.

6.6 Policy

6.7 Unlike the majority of applications this Council deals with, this application will be primarily assessed under National Policy Statements (NPS). While a short overview is provided here, it is strongly advised that members read and consider the NPS mentioned here in detail as it will be these policies that the Secretary of State will fundamentally base their decision on.

6.8 The Overarching National Policy Statement for Energy (EN-1) sets out the importance of virtually emission free energy creation in order to prevent global temperatures rising by than 2°C, while ensuring energy security. EN-1 does not make any reference to solar farm/solar energy in seeking to meet this requirement to provide carbon neutral energy security. While now outdated it expected East of England to provide 8GW of offshore wind and 3.3GW from nuclear power. It does point out the need for good design and landscape to be carefully considered.

Finally, it covers such elements as what the Health and Safety Executive (HSE) is responsible for to how NSIPs can have indirect health impacts due to for instance loss of recreation opportunities.

- 6.9 The Draft Overarching National Policy Statement for Energy (EN-1) states the requirement for Net Zero by 2050 and states solar and wind energy will need sustained growth in the next decade (NPS dated September 2021). In addition it also makes reference to the need for storage systems in order to provide reliability for intermittent renewable energy. The policy makes reference to the need to ensure health is protected and that developments of this size can have indirect impacts for instance access to public open space as well as more direct impacts for instance pollution. It makes it clear that developers with regards to biodiversity should both mitigate and seek net gain in biodiversity. With regards to design the developer should demonstrate how good design (including practicality) was secured and that both developer and Secretary of State should seek independent expertise. Where Hazardous Substances are to be held above a certain threshold it will be for the Secretary of State to consider if a separate consent is needed. The Draft EN-1 then moves on to the importance of individual aspects including assessing air quality/emissions, a whole life carbon assessment, importance of biodiversity, there is mention that impacts for instance from smoke should not cause detrimental impact on amenity, the long term importance of the historic environment ranging from buildings to landscape, that the development has an acceptable impact on the landscape and visual character of the area, impacts on land use including minimising loss of best and most versatile agricultural land, impacts caused by noise as well as vibration and the impact on the socio-economics of the area including change in workforce requirements and whether mitigation can remove any adverse impacts.
- 6.10 The National Policy Statement for Renewable Energy Infrastructure (EN-3) is not considered to be of specific relevance for this application, as it does not refer to solar farms. While not adopted it is considered that the Draft EN-3 is the most relevant National Policy Statement, as it specifically refers to solar photovoltaic generation and is presumed to show the direction of travel Government is going in when determining Solar Farm NSIPs.
- 6.11 The Draft EN-3 states that associated infrastructure such as energy storage might also come forward as part of a solar farm proposal. This National Policy Statement also states that cumulative impacts should be considered where placing solar farms in close proximity to other energy generating infrastructure caused by grid connection points. It goes on to state that a 25 year consent is typical for these schemes given the typical design life of solar panels. The draft NPS also covers that some elements of design will not be known at the time the application is considered and a worst case scenario should be assessed. Finally, this draft NPS confirms that NSIP solar farms should aim to secure biodiversity net gain, preserve existing landscape, demonstrate good design and protect heritage assets including their setting.
- 6.12 Principle of Development and Climate Change**
- 6.13 According to the Environment Statement Chapter 6: Climate Change (para 6.8.22), a total energy generation of around 23,157,296MWh is anticipated, over the 40 year

assessed lifetime, ranging, it is stated, from c650,000 MWh in year 1, and declining to c500,000 MWh in year 40 (note: solar panels typically degrade over time, hence the slight reduction in output by year 40). To put this into context an average UK home typically uses 2.9MWh / year according to Ofwat. Thus, very approximately, the proposal will, on average, power the entire needs of around 200,000 average UK homes per year. To put that figure into perspective, according to the census of 2021, there are approximately 292,000 homes across the whole of Cambridgeshire. Put simply, therefore, this proposal has the potential to power, on average, the electricity needs of approximately 2/3rds of all homes in Cambridgeshire for the next 40 years.

- 6.14 That scale of renewable energy production is undoubtedly a positive benefit of the scheme, though it is also worth establishing the 'lifetime' greenhouse gas emissions arising from the scheme (because virtually all development, unless it involved carbon capture, has at least some greenhouse gas emissions arising, including renewable energy infrastructure proposals). Such calculations account for the greenhouse gases that will be emitted through, for example, construction, operation and decommissioning of a scheme. For this proposal, it is calculated (see para 6.8.28 of the same Chapter 6 referred above) that the scheme has a 'Greenhouse Gas' (GHG) intensity of 29.2 gCO₂e/kWh. In order to put this into context, it is best to compare it with other forms of potential energy infrastructure development: a modern gas power station (a 'Combined Cycle Gas Turbine') has a GHG intensity of 380-500 gCO₂e/kWh i.e. around 15x greater GHG intensity; Nuclear performs well (typically 5 to 55 GHG intensity); whilst wind performs best (typically 5 to 24 GHG intensity, with limited difference whether that is on- or off- shore). Thus, on a complete lifetime basis, this Sunnica Ltd solar proposal, at 29.2 gCO₂e/kWh GHG intensity, performs slightly worse than would be expected for a wind based proposal, performs similar to nuclear, but performs much better (15x better) than a modern gas sourced power station. Such a relatively low GHG intensity assessment for this proposal should, therefore, be given positive weight.
- 6.15 On the 21 October 2019 East Cambridgeshire District Council declared a climate emergency.
- 6.16 This follows a year after the Intergovernmental Panel on Climate Change (IPCC) stated the world had 12 years to ensure global temperatures do not raise by more than 1.5C. Going beyond a rise of 1.5C will have a significant effect on the world's liveability. It has also stated that if there is not a 45% reduction in CO₂ levels from 2010 levels by 2030 the 2050 target will not be met.
- 6.17 The requirements of the Climate Emergency will require a complete change on how humans respond to the Earth; as either the rapid change to climate caused by humans will create a more hostile/unpredictable climate or humans will have to radically change their diet (in both senses of the definition: food/activities) and provide a continuous fight against climate change.
- 6.18 In short scientists advise that if climate change is not substantially tackled by 2030 it will be the cause of the death of large numbers of the species that inhabit the world including humans. The International Committee of the Red Cross consider there to be 250,000 more deaths in the human population each year between 2030-2050, including from malnutrition, due to climate change.

- 6.19 In order to meet this requirement East Cambridgeshire District Council has worked with both West Suffolk Council and Cambridgeshire County Council and has approved several renewable energy applications, including a large proportion of energy from solar farms. These developments include, though not limited to:
- **21/00706/ESF** - Solar Farm Land To The East Of Breach Farm Ness Road Burwell (Cross boundary application with West Suffolk Council). Can export up to 49.995MWe of renewable electricity to the National Grid during peak operation. Approved on the 10 December 2021.
 - **20/00557/ESF** – Solar Farm at Site North of Hightown Drove Burwell Cambridgeshire. Can export up to 49.995MWe of renewable electricity to the National Grid during peak operation. Approved on the 13 August 2020.
 - **20/00522/FUM** - Construction of a solar farm and associated works including inverter stations at Site South West of Meadow View Farm The Butts Soham Cambridgeshire. Can export up to 28MW of renewable electricity to the National Grid during peak operation Approved 8 October 2020.
 - **CCC/20/054/FUL** - Creation of an Energy Centre to serve the village of Swaffham Prior via a heat supply network at Land at Goodwin Farm 1 Heath Road Swaffham Prior. Approved 25 November 2020 (Cambridgeshire County Council application).
 - **CCC/20/051/FUL** - Solar PV Panels and associated infrastructure at North Angle Farm, Angle Common, Soham. Can export 29.4MW (AC) to the National Grid. Approved 19 November 2020 (Cambridgeshire County Council application).

- 6.20 Just taking the solar farm developments the Council has approved in excess of 157MW of Solar Energy since the start of 2022. In addition the Council has also approved in the same time period:
- **21/00816/FUL** - 30MW battery energy storage system facility at Weirs Drove Burwell. Approved 10 December 2021. This was an extension to the 49.9MW battery energy storage system facility already on the site (planning reference: 17/02205/FUL).

- 6.21 The principle of renewable energy is supported, with solar farms providing an important method of ensuring the National Grid moves away from reliance on fossil fuels. However, the other impacts of the proposal need to be considered and considered against the benefits of the scheme. Members will note there are significant concerns raised within the LIR and these are summarised below.

6.22 Cultural Heritage

Built Heritage

- 6.23 The area known as Sunnica West Site A (Parcels W03-W12 and W17) is located in close proximity of Grade II Listed Chippenham Historic Park and Garden that connects via an Avenue (also part of the Historic Park and Garden) the Grade II Listed Building of Chippenham Hall to the A1304. An undesignated asset, High Lodge (the southern gatehouse), located at the south-western end of the avenue, adjacent to the A1304, has recently been assessed through the current Cambridgeshire Local Heritage Project in the light of its architectural quality, and a

recommendation for inclusion in the ECDC buildings of local interest register that is pending.

- 6.24 Sunnica West Site A would surround the Grade II Historic Park and Garden that would significantly detract from what makes the Historic Park and Garden special and worthy of listing. This level of harm is considered be substantial to the setting of the park and garden, as it would completely transform the surrounding landscape. It is not considered that additional landscaping could be used to mitigate against the harm, in fact additional landscape would further add to the harm as it would reduce the historic landscape feature that is the avenue element of the Historic Park and Garden.
- 6.25 It is noted that there are public benefits of the developer proposing to improve the avenue (clearance and planting of avenue) and the provision of renewable energy. However, via good stewardship the Historic Park and Garden should be suitably managed and on this basis minimal weight should be granted to this. In addition, while the provision of renewable energy is a public benefit there are other locations in the area that could and have accommodated solar development, which has not substantially harmed the setting of historic assets.
- 6.26 Ely Cathedral can be seen from The Limekilns (located to the south of the A14 and A1304). This is an open space located in East Cambridgeshire and used for the exercise of racehorses and for recreation. However, from a heritage point of view it is not considered to harm the historical setting of Ely Cathedral.
- 6.27 It is also accepted that the proposal will have no other harmful impacts on built heritage (other listed buildings and conservation areas).
- 6.28 It is concluded that it will be for the County Council's to comment on the impact to archaeology; while this Authority should object to the substantial harm to Chippenham Historic Park and Garden due to the inclusion of Sunnica West Site A (excluding W15).

6.29 Ecology and Natural Conservation

- 6.30 The proposals have the potential to impact on a number of sites designated for their ecological interest. In East Cambridgeshire this primarily includes in relation to this application Chippenham Park County Wildlife Site (CWS), Chippenham Avenue CWS, Chippenham and Snailwell Poor's Fen Site of Special Scientific Interest (SSSI), Snailwell Meadows SSSI, Brackland Rough SSSI (linked to Fordham Woods).
- 6.31 It is noted in the Nature Network Priorities report in relation to Sunnica Solar Farm October 2022 by the Wildlife Trust for East Cambridgeshire (see Appendix 3) it is seeking:
"To create a single, large (over 500 Ha) core habitat area, connecting Chippenham Fen, Snailwell Meadows and Brackland Rough SSSIs. The area will comprise a mosaic of species-rich habitats including wildflower meadows, wetland mosaics, scrub and woodland."

- 6.32 This proposal would substantially harm the ability to provide this due to the inclusion of W01 and W02 (Sunnica West B). It is considered that this element of the proposed development specifically jeopardises the unique opportunity to aid nature recovery and restoration and provide an enormously valuable link between the Fens and the Brecks.
- 6.33 In addition to this it has been assessed by the Wildlife Trust and other ecologists that several ecological assessments are not fully comprehensive and do not allow for clear conclusions on the level of impact expected and the suitability of the mitigation proposals. It is considered that in a number of cases compensation/mitigation measures are either inadequate, too vaguely defined or inadequately secured by the proposed DCO to give certainty that all ecological impacts can be satisfactorily addressed as part of the development proposal, including in the long-term post decommissioning.
- 6.34 To conclude, it is considered that the developer has failed to provide suitable evidence in order to assess the potential impacts on biodiversity that the development will cause. This evidence must be provided prior to determination or this proposed NSIP should be refused. Notwithstanding this, W01 and W02 will prevent the ability to provide long term biodiversity net gain in the local area. On this basis it is recommended that this Council objects to this proposal on unacceptable biodiversity impacts.

6.35 Landscape and Visual Amenity

- 6.36 East Cambridgeshire District Council has benefited from a Senior Landscape Officer at Suffolk County Council (working with their counterpart in West Suffolk Council) who has provided professional expertise in forming our response to the Local Impact Report. The LIR concluded that:
“The scale, duration and geographical extent of the proposed development are likely to result in widespread and significant adverse landscape impacts, and prolonged and, in some cases, permanent adverse visual impacts.”
- 6.37 The LIR goes on to state in regards to Sunnica West:
“The site that has been chosen for Sunnica West A is unsuitable for the development of the proposed solar panels from a landscape and visual impact perspective. Not only is the area visually sensitive; this is a historic landscape and the setting of historic assets (Chippenham Registered Park and Garden, the avenue), which puts constraints on otherwise possible mitigative planting [see further detail where impacts are considered by phase]. However, subject to exemplary design and mitigation strategy, the area is likely to be able to accommodate the BESS. The removal of solar panels and associated infrastructure from the Sunnica West A would significantly reduce the extent of harm.”
- 6.38 In regards to Sunnica East the LIR stated:
“Lee Brook would be a more appropriate boundary for this development proposal and that E05 should be removed or significantly reduced in size.”
- 6.39 It is considered that The Ark (Isleham Church) at year 1 post E05 being built, visitors and church users would experience a Moderate Adverse visual effect and

that landscaping in order to obscure the development will also harm this edge of fen landscape by significantly reducing its openness.

- 6.40 It is on this basis it is recommended that W03-W12 and E05 be objected to. It should be noted that the Senior Landscape Officer has considered that from a landscape point of view it would be possible for W17 to remain if a high quality landscape was brought forward. In addition it is not considered reasonable to object to W15 on landscape grounds, as while this is agricultural fields it is between A11 and A14 with Kennett extending in this direction.
- 6.41 With no significant ecology, heritage and landscape concerns raised in regards to W15 it is considered that this parcel is suitable from the perspective of East Cambridgeshire District Council to be brought forward for solar development if suitable mitigation was put in place.
- 6.42 The tree constraints report appendix 10B is incomplete as map 10 only has some of its information visible the rest of the page being blank, maps 11 to 19 are identical and are a blank page with only the red line boundary plotted therefore this cannot be assessed. As these maps are the main ones that cover the ECDC area it is not possible to make any assessment of the local impact at this time.
- 6.43 Since Sunnica was submitted for examination the avenue of trees along Chippenham Road (between Chippenham and Snailwell) have been protected via a Tree Preservation Order (TPO). These trees might be damaged and/or removed in the laying of the cable between W03 and W02 and due to construction work accessing W03. However, again with a lack of information submitted it is not possible to assess this.
- 6.44 In regards to trees it is concluded that the developer has failed to provide suitable material that would allow for a suitable assessment to be made. On this basis an objection should be raised, as trees provide landscape and biodiversity benefits.
- 6.45 Noise, Vibration, Dust, Light/Glare**
- 6.46 The nature, size and duration of the construction phase of this development is likely to cause adverse effect on nearby sensitive receptors. The applicant states that construction is proposed to take place Monday to Saturday 0700-1900. This has been considered to be unacceptable by both District Council's and it is recommended that hours of construction, if the scheme is approved:
- Construction hours to be limited to between 0800 and 1800 Mon-Fri, 0800 and 1300 Sat and at no time on Sundays, Public Holidays or Bank Holidays.
 - Piling operational hours to be limited to between 0900 and 1700 Mon-Fri and at no time on Saturdays, Sundays, Public Holidays or Bank Holidays.
- 6.47 These hours of construction work are recommended in order to prevent detrimental harm to residential amenity for the majority of residents.
- 6.48 It is noted that the developer is proposing a Construction Environmental Management Plan (CEMP) in the draft Development Consent Order (DCO) and this will be vital in order to ensure construction noise and other disturbance is controlled

prior to any work commencing. If this is not achieved it is highly likely to put the Council's Environmental Health Team (EHO) in an impossible situation to deal with noise complaints.

- 6.49 Plant types and specifications have not yet been confirmed. It will be key going forward that it can be demonstrated that estimates of impacts have not been underestimated. It is noted that within the draft DCO that operational noise will be controlled via a requirement. The future information contained within this potential requirement, like the CEMP, will need to be both sufficient and time given in order to assess it.
- 6.50 Impacts from noise from decommissioning activities are considered to be negative to varying degrees. However, if suitably managed this harm is unlikely to be significant.
- 6.51 With regards to dust pollution the Council's EHO considers the proposed draft CEMP to be acceptable. In regards to artificial lighting proposals there are no concerns from a EHO perspective during construction and operational phases of the development providing there is compliance in full with the detail contained in the framework CEMP.

6.52 Socio Economics and Land Use

- 6.53 It is considered that the applicant's socio-economic assessment is inadequate, given substantial concerns about its methodology, the use of unrealistic assumptions and invalid conclusions. As such, the assessment does not allow for an informed conclusion. As detailed in the LIR there are significant concerns about the impact of the proposals on the local economy and employment market. The primary concerns are listed below, though as detailed above the LIR needs to be referred to in order to gain the full perspective on the potential harm to the local economy.
- 6.54 One potential significant harm is to the horse racing industry centred around Newmarket. It is noted that experts in the Newmarket horse racing industry are engaged in this examination process and the Examination Authority (ExA) should consider these views given the potential and long term harm to a historic industry within the area while also being a world leading centre in horse racing.
- 6.55 There is also substantial concern that the proposed development will have a detrimental impact upon the major businesses along the A142 stretching from Snailwell to Lancaster Way (Ely) during construction due to large amounts of construction traffic and the workforce commuting in.
- 6.56 Finally, it is expected there will be a negative impact on agriculture, as a result of loss land for food production and loss of employment related to agriculture. It has also been noted that the public, farmers and other experts with our local community have raised substantial concern, primarily on the loss of best and most versatile land (grade 1, 2 or 3a). It is noted that the Say No to Sunnica Action Group have commissioned an independent soil assessment report.

6.57 It will be for the ExA to come to a conclusion on the impact on the horse racing industry and the level of loss of best and most versatile agricultural land. This might involve seeking further independent advice, but this will be for ExA to come to a view on.

6.58 Air Quality

6.59 As detailed within the LIR, there are no significant concerns with regards to vehicle air pollution during construction, operation and decommissioning.

6.60 There is the potential for fire, specifically from the Battery Energy Storage Systems (BESS). It is noted that BESS are constantly changing which leads to a number of unknowns. There will need to be a refinement of the assessment following the completion of the detailed design and specification of the BESS. This will need to be secured by the terms of the DCO and should be strongly influenced by the expertise of the Fire Authorities to ensure both residents and fire fighters are suitably protected. However, it is noted that given this technology is very much emerging and changing at a rapid pace the fire services are unlikely to provide definitive response in terms of supporting or rejecting the proposal.

6.61 It is expected that the Fire Safety Management Plan includes a sufficient secured water supply for putting out any fire and measures to ensure that the use of such water does not pollute the ground water.

6.62 Contaminated Land

6.63 With regards to land contamination it is considered that the developer's reports have been produced to an acceptable level. These reports make recommendations for further intrusive investigations and there will need to be a commitment that these recommendations are complied with. There is a requirement in the draft DCO which does ensure this.

6.64 Other Matters

6.65 In recent years there have been a number of proposals for energy related development in the East of England. There are several solar farm proposals, a number of consented and operational offshore windfarms, with onshore infrastructure, the proposed nuclear power station at Sizewell C, and proposals for further offshore windfarms and interconnectors. Accompanying this are related demands on the National Grid and therefore Grid extension proposals required by the developments. Some of those that reside within East Cambridgeshire have been detailed above.

6.66 The cumulative impacts add to the complexity of reviewing and assessing the impacts of this proposal and considering the required mitigation measures.

6.67 Summary

6.68 This application is a being considered by the Examining Authority, prior to the Secretary of State making a decision. This Council is being asked to comment on the impacts that Sunnica will have on the local area (covered by the Local Impact

Report written by officers) and whether it supports or objects. This committee is recommended to object to the development as detailed in paragraph 1.1 of this report.

Appendix 1 – Draft response to Examining Authority

Appendix 2 – Joint Local Impact Report

Appendix 3 – Nature Network Priorities in relation to Sunnica Solar Farm October 2022

Background Documents

Location

Contact Officer(s)

Andrew Phillips
Room No. 011
The Grange
Ely

Andrew Phillips
Planning Team Leader
01353 665555
andrew.phillips@eastcambs.gov.uk

National Planning Policy Framework -

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

East Cambridgeshire Local Plan 2015 -

<http://www.eastcambs.gov.uk/sites/default/files/Local%20Plan%20April%202015%20-%20front%20cover%20and%20inside%20front%20cover.pdf>

National Infrastructure Planning – documents being considered

<https://infrastructure.planninginspectorate.gov.uk/projects/eastern/sunnica-energy-farm/?ipcsection=docs>

Draft Response to the Examining Authority

For the avoidance of doubt, the Planning Committee notes the conclusions formed in the joint Local Impact Report. This letter seeks to elaborate or bring specific light on the main concerns of East Cambridgeshire District Council and should be seen as supplementary to the Local Impact Report.

East Cambridgeshire District Council support projects for renewable energy development in accordance with policy ENV6 of the East Cambridgeshire Local Plan 2015.

However, given the size of the Scheme, the period of time it will be in situ, its overall poor quality, the detrimental harm to the long term landscape would not be outweighed by the benefit of renewable energy. The following sections of the development should be removed from the development as a landscaping scheme would not mitigate against the long term harm:

- E05
- W03 – W12

It is considered that the proposal has not met the requirements of chapter 4.5 and para 5.9.8 of EN-1, and also does not comply with chapter 2.51 of the draft EN-3.

The proposal does not provide sufficient information about the impact of the scheme on trees and the surrounding landscape. The Draft Development Consent Order is seeking to allow the developer to cut down trees protected by Tree Preservation Orders (TPO), which is considered unacceptable. The developer is seeking powers to remove important trees and landscape features before they are required to provide a landscape scheme. Given the lack of quality information the proposal is considered not to comply with para 5.3.14 of EN-1 or 2.51.5 of the draft EN-3.

It is considered that the developer has failed to provide adequate reports or understanding of the potential impact on biodiversity within the local area/development site. Specifically it is recommended the following parcels should be removed from the development as this would lead to the long term detrimental harm to biodiversity within the district to Chippenham Fen (Ramsar and SSSI) and Snailwell Meadows (SSSI):

- W01-W02

On this basis the proposal is considered not to be able to comply with both national and local policy, specifically paras 5.3.5, 5.3.11 and 5.3.18 of EN-1 and para 2.50.11 of the draft EN-3.

The proposal would lead to substantial harm to the setting of the Grade II Historic Park and Garden of Chippenham Hall, specifically the avenue that connects Chippenham Hall to Newmarket. This harm is not outweighed by the provision of renewable energy, as there are other locations solar farms can be located without causing this level of harm to a heritage asset. In addition, the proposed additional landscaping the developer is suggesting will cause further harm to the historic avenue as it will erode what makes the avenue significant. On this basis parcels W03-W12 and W17 should

be removed, as it fails to comply with para 5.8.14 of EN-1 and para 2.53.5 of the draft EN-3.

East Cambridgeshire District Council would also like to draw to the attention of the Examining Authority that the draft EN-3 suggests a Solar Farm of this scale should be typically limited to a lifetime of 25 years while the developer is seeking a 40 year consent without exceptional justification. If the Secretary of State was to approve the application it is requested it is limited to a 25 year lifetime in accordance with emerging national policy.

The Council while not having expertise in battery management or safety would want to see appropriate mitigation measures (secured by the DCO requirements) that ensure that a battery fire does not pose an unnecessary risk to either the public or firefighters; in addition ensuring the environment is protected for instance against water pollution. Given as battery technology is changing at a fast rate this might involve, but not limited to requiring the developer at its expense training the fire services on how to deal with a potential fire. However, the Council will support the comments of the Fire Services and other independents who have expertise in this field.

Again, while the Council does not have expertise in regards to the measuring of the quality of farmland given the great concern raised by the public and those with specialist knowledge, it is requested that an independent survey is undertaken to assess the Agricultural Land Classification and the versatility of this farmland. It is considered this of great importance given the scale of the development.

East Cambridgeshire District Council requests that the Examining Authority provides dedicated time in order to hear and consider those who work within the Newmarket Horse Racing Industry.

The proposed impacts on the wider economy of the local area has not been assessed correctly and on this basis the methodology and assessment of the workforce and its origins presented by the applicant is not sufficient to make an informed decision.

It is requested that the Examining Authority also considers the appropriateness of using Draft Overarching National Policy Statement for Energy. Specific reference here is not made as the draft EN-3, seems to be of direct relevance to what is primarily a solar farm development.

On the basis for the reasons listed above East Cambridgeshire District Council objects to this proposed development.